

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: Lindell Management LLC Litigation

Case No. 23-cv-1433
(JRT/DJF)

**DECLARATION OF
CARY JOSHI**

I, Cary Joshi, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney with Bailey & Glasser LLP. I am over the age of 18 and make this declaration upon my personal knowledge.
2. The attached accounting (Exhibit A) is a copy of the billing records of my firm and reflects the hourly rate and attorney's fees incurred in bringing the motion to compel against Lindell Management LLC (ECF 62).
3. The total incurred for attorney's fees is \$12,880.
4. I declare under penalty of perjury that pursuant to the laws of the United States of America that the foregoing is true and correct.

DATED: July 23, 2024

BAILEY & GLASSER LLP

/s/ Cary Joshi
Cary Joshi
Attorney for Petitioner Robert Zeidman

EXHIBIT A

Time Report

Billed and Unbilled

Zeidman, Robert / Contract Case (ZEID001-2003596)

07/18/2024

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
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Time Report

Billed and Unbilled

Zeidman, Robert / Contract Case (ZEID001-2003596)

07/18/2024

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
04/10/2024	1173	Joshi, Cary L		1000	Partner	1771	0.20	160.00	800.00	0.20	160.00	800.00	10000		0	Unbilled
Research motion to compel.																
04/11/2024	1173	Joshi, Cary L		1000	Partner	1771	2.60	2,080.00	800.00	2.60	2,080.00	800.00	10000		0	Unbilled
Contact court for motion hearing; research procedure for motion; research final judgments.																

Time Report

Billed and Unbilled

Zeidman, Robert / Contract Case (ZEID001-2003596)

07/18/2024

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
04/22/2024		1173	Joshi, Cary L	1000	Partner	1771	0.30	240.00	800.00	0.30	240.00	800.00	10000		0	Unbilled
Prepare notice of hearing.																
04/23/2024		1173	Joshi, Cary L	1000	Partner	1771	1.40	1,120.00	800.00	1.40	1,120.00	800.00	10000		0	Unbilled
Prepare motion to compel.																
04/24/2024		1173	Joshi, Cary L	1000	Partner	1771	0.30	240.00	800.00	0.30	240.00	800.00	10000		0	Unbilled
Prepare motion to compel.																
04/26/2024		1173	Joshi, Cary L	1000	Partner	1771	3.50	2,800.00	800.00	3.50	2,800.00	800.00	10000		0	Unbilled
Prepare motion to compel post-judgment discovery.																

Time Report

Billed and Unbilled

Zeidman, Robert / Contract Case (ZEID001-2003596)

07/18/2024

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
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05/06/2024	1173	Joshi, Cary L		1000	Partner	1771	0.50	400.00	800.00	0.50	400.00	800.00	10000		0	Unbilled
Conference with opposing counsel , re: motion to compel and extension of time.																

05/07/2024	1173	Joshi, Cary L		1000	Partner	1771	0.40	320.00	800.00	0.40	320.00	800.00	10000		0	Unbilled
Review motion by opposing counsel.																

Time Report

Billed and Unbilled

Zeidman, Robert / Contract Case (ZEID001-2003596)

07/18/2024

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
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05/21/2024	1173	Joshi, Cary L		1000	Partner	1771	0.30	240.00	800.00	0.30	240.00	800.00	10000		0	Unbilled
Review order to postpone hearing and Correspond with opposing counsel .																

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
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Time Report

Billed and Unbilled

Zeidman, Robert / Contract Case (ZEID001-2003596)

07/18/2024

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
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06/05/2024	1173	Joshi, Cary L		1000	Partner	1771	1.30	1,040.00	800.00	1.30	1,040.00	800.00	10000		0	Unbilled
Conference with M. Rios, re: discovery hearing; research collections in MN; draft discovery motion.																

06/06/2024	1173	Joshi, Cary L		1000	Partner	1771	0.20	160.00	800.00	0.20	160.00	800.00	10000		0	Unbilled
Correspond with court, re: discovery hearing date.																

Time Report

Billed and Unbilled

Zeidman, Robert / Contract Case (ZEID001-2003596)

07/18/2024

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
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Zeidman, Robert / Contract Case (ZEID001-2003596)

07/18/2024

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
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Time Report

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Zeidman, Robert / Contract Case (ZEID001-2003596)

07/18/2024

Date	SM/Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
07/11/2024	1173	Joshi, Cary L	1000	Partner	1771	0.40	320.00	800.00	0.40	320.00	800.00	10000		0	Unbilled
Prepare for discovery hearing.															
07/16/2024	1173	Joshi, Cary L	1000	Partner	1771	2.80	2,240.00	800.00	2.80	2,240.00	800.00	10000		0	Unbilled
Review pleadings and research in preparation for hearing on motion to compel.															
07/17/2024	1173	Joshi, Cary L	1000	Partner	1771	1.90	1,520.00	800.00	1.90	1,520.00	800.00	10000		0	Unbilled
Prepare for and attend hearing on motion to compel.															

Time Report

Billed and Unbilled

Zeidman, Robert / Contract Case (ZEID001-2003596)

07/18/2024

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status